```
1
             IN THE UNITED STATES DISTRICT COURT
              FOR THE SOUTHERN DISTRICT OF TEXAS
2
                        HOUSTON DIVISION
3
     TAMMY ALVARADO; CLARA
     REDMOND; TAMMY HAGA; AMY
4
     RUMINSKI and PAMELA JOHNSON,)
5
               Plaintiffs,
                                  ) Civil Action No.
                                  ) 4:19-CV-02148
6
               vs.
7
     CLARK, LOVE & HUTSON, G.P.; )
     LEE & MURPHY LAW FIRM, G.P.;)
     CLAYTON A. CLARK; CLAYTON A.)
8
     CLARK, ESQ., PC; SCOTT A.
9
     LOVE; SCOTT A. LOVE, PC;
     SHELLEY HUTSON; HUTSON LAW
10
     FIRM, P.C.; JAMES LEE, JR.; )
     JAMES LEE LAW FIRM, PC; and )
11
     ERIN MURPHY,
12
               Defendants.
13
14
               REMOTE VIDEOTAPED ORAL DEPOSITION OF
15
                          ERIN MURPHY
16
                        OCTOBER 14, 2020
17
                           9:03 a.m.
18
19
20
                      Witness's Location:
21
                        Law Offices of
       Ware, Jackson, Lee, O'Neill, Smith & Barrow, LLP
                       2929 Allen Parkway
22
                           39th Floor
23
                      Houston, Texas 77019
24
25
          Reported Remotely Via Zoom Videoconference
                                                      Page 1
```

Veritext Legal Solutions 800-336-4000

```
1
                     APPEARANCES
 2
          (All parties present via videoconference)
 3
 4
     FOR THE PLAINTIFFS:
 5
          MR. JAMES M. BEGGS
          BEGGS LANDERS LAW FIRM, PLLC
          140 East Irving Boulevard
 6
          Irving, Texas 75060
 7
          Phone: (972) 253-8000
          Fax: (972) 253-9000
8
          jim@beggslaw.com
9
     FOR THE DEFENDANTS LEE & MURPHY LAW FIRM, G.P., JAMES
     LEE, JR., JAMES LEE LAW FIRM, PC, and ERIN MURPHY:
10
          MR. DON JACKSON (present with the witness)
11
          MR. K. KNOX NUNNALLY
          WARE, JACKSON, LEE, O'NEILL, SMITH & BARROW, LLP
12
          America Tower, 39th Floor
13
          2929 Allen Parkway
          Houston, Texas 77019
14
          Phone: (713) 659-6400
          Fax: (713) 659-6262
15
          donjackson@warejackson.com
          knoxnunnally@warejackson.com
16
17
     FOR THE DEFENDANTS CLARK, LOVE & HUTSON, G.P., CLAYTON
     A. CLARK, CLAYTON A. CLARK, ESQ. PC, SHELLEY HUTSON,
18
     and HUTSON LAW FIRM, P.C.:
19
          MR. DALE JEFFERSON
          MARTIN, DISIERE, JEFFERSON & WISDOM
20
          808 Travis
          Suite 1100
          Houston, Texas 77002
2.1
          Phone: (713) 632-1700
22
          Fax: (713) 222-0101
          jefferson@mdjwlaw.com
23
24
25
                                                    Page 2
```

Veritext Legal Solutions 800-336-4000

```
1
                     APPEARANCES, CONTINUED
 2
 3
     FOR THE DEFENDANTS SCOTT A. LOVE and SCOTT A.
     LOVE, PC:
 4
          MR. BILLY SHEPHERD
 5
          SHEPHERD PREWETT, PLLC
          770 South Post Oak Lane
          Suite 420
 6
          Houston, Texas 77056
 7
          Phone: (713) 955-4440
          Fax: (713) 766-6542
          bshepherd@spcounsel.com
 8
 9
10
     ALSO PRESENT:
11
          Mr. James Lee, Jr. - Defendant
12
          Ms. Jennifer Black - Clark, Love & Hutson, G.P.
13
          Mr. Will Rain - Videographer
14
15
16
17
18
19
20
21
22
23
24
25
                                                     Page 3
```

Veritext Legal Solutions 800-336-4000

1 Α. Only one right now. 2 Ο. Any children? 3 Α. I have two. Very nice. Boy and girl or --4 Q. Α. 5 I have one girl and one boy. 6 O. Wonderful. All right. 7 And where did you go to law school, 8 Ms. Murphy? South Texas College of Law. 9 Α. Okay. When did you graduate? 10 Ο. 11 Α. 2003. 12 Q. And then where did you go to work after law school? 13 I worked for the Mostyn Law Firm. 14 Α. 15 I'm sorry. Say that again? Ο. 16 Α. The Mostyn Law Firm. 17 Mostyn. Okay. Ο. 18 M-O-S-T-Y-N. Α. 19 How long were you there? Ο. 20 Α. 2003, as a lawyer, through 2008. I did previously clerk there, I believe in 2002. 21 22 Ο. What was your position? 23 I was an associate attorney beginning in 24 2003. 25 All right. And when did you leave there? Ο. Page 11

1		Α.	I believe September of 2008.
2		Q.	And who did you go to work with then?
3		Α.	I went to work with what was then Clark,
4	Dean	& Bu	rnett.
5		Q.	And what was your position there?
6		A.	Associate attorney.
7		Q.	Okay. What law firm did you work for in
8	2011	?	
9		Α.	Clark, Burnett, Love & Lee.
10		Q.	And what was your position there?
11		Α.	Associate attorney.
12		Q.	Okay. What law firm did you work for in
13	20123	?	
14		Α.	Lee Murphy Law Firm.
15		Q.	And what was your position there?
16		Α.	Partner.
17		Q.	Okay. What about 2013 and 2014?
18		Α.	The same answer, Lee Murphy.
19		Q.	And that is your current law firm,
20	correct?		
21		Α.	Correct.
22		Q.	Okay. And your position is partner?
23		Α.	Partner, uh-huh.
24		Q.	Are you a managing partner or
25		Α.	No.
			Page 12
			FugC 12

```
1
             IN THE UNITED STATES DISTRICT COURT
              FOR THE SOUTHERN DISTRICT OF TEXAS
 2
                        HOUSTON DIVISION
 3
     TAMMY ALVARADO; CLARA
     REDMOND; TAMMY HAGA; AMY
 4
     RUMINSKI and PAMELA JOHNSON,)
 5
               Plaintiffs,
                                  ) Civil Action No.
                                  ) 4:19-CV-02148
 6
               VS.
 7
     CLARK, LOVE & HUTSON, G.P.; )
     LEE & MURPHY LAW FIRM, G.P.;)
8
     CLAYTON A. CLARK; CLAYTON A.)
     CLARK, ESQ., PC; SCOTT A.
     LOVE; SCOTT A. LOVE, PC;
9
     SHELLEY HUTSON; HUTSON LAW
10
     FIRM, P.C.; JAMES LEE, JR.; )
     JAMES LEE LAW FIRM, PC; and )
11
     ERIN MURPHY,
12
               Defendants.
13
                  REPORTER'S CERTIFICATE
14
            REMOTE VIDEOTAPED ORAL DEPOSITION OF
                          ERIN MURPHY
15
                       OCTOBER 14, 2020
               I, KAREN L. SHELTON, a Certified Shorthand
16
     Reporter in and for the State of Texas, hereby certify
17
18
     to the following:
               That the witness, ERIN MURPHY, was duly
19
     sworn by the officer and that the transcript of the
20
21
     oral deposition is a true record of the testimony
22
     given by the witness;
23
               I further certify that pursuant to FRCP Rule
2.4
     30(e) that the signature by the deponent:
25
               ___ was requested by the deponent or a party
                                                    Page 71
```

Veritext Legal Solutions 800-336-4000

1 before the completion of the deposition and is to be returned within 30 days from date of receipt of the 2 transcript. If returned, the attached Errata contains 3 any changes and the reasons therefor; 4 5 _X_ was not requested by the deponent or a 6 party before the completion of the deposition. 7 I further certify that I am neither counsel for, related to, nor employed by any of the parties or 8 attorneys in the action in which this proceeding was 9 10 taken, and further that I am not financially or otherwise interested in the outcome of the action. 11 12 13 Certified to by me this 16th day of October, 14 2020. 15 16 Karen L. Sheeton 17 18 Karen L. Shelton, CSR, RDR, CRR 19 TX CSR 7050 Exp: 10/31/21 Veritext Legal Solutions Firm No. 571 20 300 Throckmorton Street Suite 1600 21 Fort Worth, Texas 76102 2.2 (817) 336-3042 (800) 336-4000 23 2.4 25 Page 72